

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
	:	Chapter 11
In re.	:	
	:	
DELPHI CORPORATION et al	:	Case No. 05-44481
	:	
(Debtors)	:	(Jointly Administered)
	:	
-----X	:	

RESPONSE TO NOTICE OF OBJECTION TO CLAIM

1. Claims objection: Claims subject to modification

2. Name of the claimant:

CH2M HILL Spain, S.L.

Calle Juan de Mariana 17 – portal B-3º

28045. Madrid (Spain)

3. Basis for the amount of claim:

The modified amount included within the “Notice of Objection to Claim” received by CH2M HILL Spain, S.L. is lower than the initial claimed amount because of two unpaid invoices having not been considered: one of \$350.00 and another one of \$3,113.00. Just the one of \$3,113.00 (CH2M HILL Spain SL’s invoice number E21/01, sent on April 6, 2001) is claimed again (apart from those already included in the modified amount of \$25,372.60)

4. Statement of reasons:

CH2M HILL Spain SL’s invoice number E21/01, sent on April 6, 2001, for a quantity of \$3,113.00 is related to a project conducted in Spain and Portugal, using a time + expenses scheme for invoicing. Because of it, our invoice E21/01, which covered the

months of February and March 2001, included a breakdown of hours used during that period of time (see below an electronic copy of this invoice).

The Delphi Project Manager was Ms. Caroline Harvey-Light, which was assisted by Ms. Kimberly Bowden..

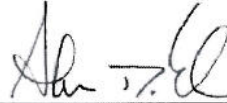
We are attaching two electronic documents to show that we were working in this project during February-March 2001:

- a) An extraction of our internal system referred to the hours charged by Ms. Maria Quintana, Project Manager of CH2M HILL for this project. It is not possible to have the same extract for the other individuals in the invoice, below, because they are not longer with CH2M HILL Spain, S.L.
 - b) Two e-mails between Delphi and CH2M HILL Spain, S.L. staff, dated February 8 and March 1, 2001, in which Delphi staff required some works to CH2M HILL Spain, S.L. for those dates. There are many other e-mails in our files, but they may content confidential information (they are e-mails on technical issues), so they are not provided here.
- 5) Amount of claim: The total amount that CH2M HILL Spain, S.L. understand should be paid by Delphi Corporation is \$28,485.60.
- 6) Address for the response: Please, submit the Response to the same address as the one presented in the Claim.

Attachments:

- Electronic copy of the CH2M HILL Spain, S.L. invoice E21/01, sent on April 6, 2001, for a quantity of \$3,113.00
- Excel file with an extraction of the hours charged by Ms. Maria Quintana, Project Manager of CH2M HILL Spain, S.L. to the project conducted on behalf of Delphi for which invoice E21/01 was submitted.
- Two e-mails, containing general communications between Delphi and CH2M HILL Spain, S.L. staff, dated February 8 and March 1, 2001.

Dated: May 23, 2007

A handwritten signature in black ink, appearing to read 'Alan D. Schuchman', is written over a horizontal line.

Alan D. Schuchman
CH2M HILL, Inc.

Service copies to:

Delphi Corporation
5725 Delphi Drive
Troy, Michigan 48098
Attn: General Counsel

Skadden, Arps, Slate, Meagher, and Flom, LLP
333 West Wacker Drive, Suite 2100
Chicago, IL 60606
Attn: John Wm. Butler, Jr., John K. Lyons, Joseph N. Warton

INVOICE

Number: E021/01
Date: April 6th, 2001

CLIENT

Company name: DELPHI Automotive Systems
VAT:
Address: M/C 480.414.260
1450 West Long Lake Road
Troy-Michigan - 48098 EE.UU
To: Mrs. Carol Harvey-Light

DESCRIPTION

Project title: FISP in Logroño (Spain) and Ponte do Sur (Portugal), Phase 0
Project number: P-101896
Items billed: Dedication of hours in February and March, 2001

Consultant	Hours	Rate per hour	Total (US \$)
María Quintana	21	53	1113
Jaime Fernandez	29	50	1450
José Gómez		55	0
Alexandra Sequeira	11	50	550
Esmeralda Vázquez (Secretary CH2MHILL)	0	28	0
			3.113

AMOUNT

Total amount 3,113.00 US \$

PAYMENT METHOD

Order bank check or bank transfer to our account
BCH - C/ COSTA RICA, 16 - C.P. 28016 Madrid
Account number : 0049-1817-06-2510088534

Project Manager:

Project	Task	Employee/Supplier	# Emp/Supplier	Expend Type	Item Date	HOURS	PA Date	UOM	Expend Type Class
302136	A1.01	QUINTANA, MARIA	CHI00017504	LABOR-CONSULTING	23-Feb-01	1	23-Feb-01	Hours	Straight Time
302136	A1.01	QUINTANA, MARIA	CHI00017504	LABOR-CONSULTING	23-Feb-01	13	23-Feb-01	Hours	Straight Time
302136	A1.01	QUINTANA, MARIA	CHI00017504	LABOR-CONSULTING	23-Feb-01	1	23-Feb-01	Hours	Straight Time
302136	A1.01	QUINTANA, MARIA	CHI00017504	LABOR-CONSULTING	30-Mar-01	1	30-Mar-01	Hours	Straight Time
302136	A1.01	QUINTANA, MARIA	CHI00017504	LABOR-CONSULTING	30-Mar-01	5	30-Mar-01	Hours	Straight Time
						21			

From: carol.light@delphiauto.com
Sent: Thursday, February 08, 2001 12:21 PM
To: Quintana, Maria/MAD
Subject: Re: FISP Spain

Attachments: ATT120906.txt



ATT120906.txt (3
KB)

I left you a voice mail. I'm expecting the requirements by the end of business today, so I hope you will have them tomorrow.

Best regards,

Carol

"Quintana, Maria/ESP" <mquintan@ch2m.com> on 02/07/2001 08:53:27 AM

To: Carol Light@US_GM_SAG_ZAA01
cc:

Subject: FISP Spain

ATT120906.txt

Dear Carol,

I need from you the requirements for the format of the scanning of the MSDS of Logrono, in order to send them to you as soon as possible.

Thank you and best regards,

María Quintana de la Pedraja
mquintan@ch2m.com
CH2MHILL-Environment Transport & Planning
Coordinadora de Proyectos
Parque Empresarial San Fernando
Edificio Berlín, 1ª Pta.
28830-San Fernando de Henares
Tf. directo:+34 - 91 627 65 37
Centralita: +34 - 91 627 65 00
Fax: +34 91 627 65 57

Received: from plmlir5.mail.eds.com ([205.191.22.45]) by
usabhm98.mail.delphiauto.com (Lotus SMTP MTA v4.6.5 (863.2 5-20-1999)) with
SMTP id 052569EC.004DF7C4; wed, 7 Feb 2001 09:11:37 -0500
Received: from plmlir5.mail.eds.com (localhost [127.0.0.1])
by plmlir5.mail.eds.com (8.11.1/8.11.0) with ESMTMP id f17EBd122597
for <carol.light@delphiauto.com>; wed, 7 Feb 2001 09:11:39 -0500 (EST)
Received: from plmler4.mail.eds.com (plmler4.mail.eds.com [199.228.142.74])
by plmlir5.mail.eds.com (8.11.1/8.11.0) with ESMTMP id f17EAio21699
for <carol.light@delphiauto.com>; wed, 7 Feb 2001 09:10:44 -0500 (EST)
Received: from durango.ch2m.com (durango.ch2m.com [198.91.8.16])
by plmler4.mail.eds.com (8.11.1/8.11.1) with ESMTMP id f17EAHG09373
for <carol.light@delphiauto.com>; wed, 7 Feb 2001 09:10:44 -0500
Received: by durango.ch2m.com with Internet Mail Service (5.5.2653.19)
id <124728LG>; wed, 7 Feb 2001 07:10:37 -0700
Message-ID: <214CE41731E6D311B3E600508B92DFB72D8284@posets.ch2m.com>
From: "Quintana, Maria/ESP" <mquintan@ch2m.com>
To: =?iso-8859-1?Q?Carol_Harvey-Light_=28Correo_electr=F3nico=29?=
<carol.light@delphiauto.com>
Subject: FISP Spain
Date: wed, 7 Feb 2001 06:53:27 -0700
Return-Receipt-To: "Quintana, Maria/ESP" <mquintan@ch2m.com>
MIME-Version: 1.0
X-Mailer: Internet Mail Service (5.5.2653.19)
Content-Type: text/plain;
charset="iso-8859-1"
Content-Transfer-Encoding: quoted-printable

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|usabhh99/us/delphiauto
|USTRYH99/us/delphiauto
|US_SAG_ZAAN01
|US_SAG_ZAAN21
|----->
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|09:11:44 AM
|02/07/2001 09:11:43 AM - 02/07/2001
|-----|
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ATT120906.txt

09:12:34 AM
02/07/2001 09:12:37 AM - 02/07/2001
09:14:20 AM
02/07/2001 09:10:00 AM - 02/07/2001
09:10:01 AM
02/07/2001 09:15:06 AM - 02/07/2001
09:15:07 AM

>-----

Carol Harvey-Light
1450 West Long Lake Road
M/C 480.414.260
Troy, MI 48098
e-mail: carol.light@delphiauto.com
Telephone: 248-267-5950
Fax: 248-267-5975
Pager: 888-324-3469

From: Alexandra Nunes [alexandra.nunes@gomesdecastro.pt]
Sent: Thursday, March 01, 2001 3:35 AM
To: kimberly.p.bowden@delphiauto.com
Cc: Quintana, Maria/MAD; Carol Harvey-Light
Subject: Re: Inforamtion for modeling

Hello Kim,

I can confirm that we don't have any information concerning the points raised in your email.

I also believe that we should go back to the plant to get all information available. If you agree I'm planning to go to the plant next monday or tuesday depending on Luciana availability. We also could take the opportunity to clarify some of the issues identified on the email concerning Ponte de Sor revised - FISP waste media eval table. Please let me know as soon as possible whether you agree with this sugestion in order I can contact Luciana.

Regards

Alexandra

----- Original Message -----

From: <kimberly.p.bowden@delphiauto.com>
To: Alexandra Nunes <alexandra.nunes@gomesdecastro.pt>
Cc: <carol.light@delphiauto.com>
Sent: Wednesday, February 28, 2001 11:51 PM
Subject: Inforamtion for modeling

>
> Alexandra the following information is for the air analysis and I
> believe
we
> will have to go back to the plant to get the information. I just
> wanted
to make
> sure that you didn't have any of it. Carol is out of the office until
March 8.
>
> Also I have a question about modeling the boilers. The plant was
> under
the
> impression that the boilers have to be modeled, is there a modeling
program that
> is used in Portugal? Do you have a copy of it in english?
> ----- Forwarded by Kimberly P. Bowden on 02/28/2001
> 06:49
PM